

Case 22-11068-JTD

Claim Number 7541

Claimant - Evgenii Volfman

To:

- **Office of the Clerk of the United States Bankruptcy Court for the District of Delaware**

824 Market Street, 3rd Floor, Wilmington, Delaware 19801, The United States of America

Email copy to:

- **Sullivan & Cromwell LLP**
Attention: Christian P. Jensen (jensenc@sullcrom.com)
David M. Rosenthal (rosenthald@sullcrom.com)
125 Broad Street, New York, NY 10004
- **Landis Rath & Cobb LLP**
Attention: Adam G. Landis (landis@lrclaw.com)
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919 Market Street, Suite 1800, Wilmington, Delaware 19801

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From:

- **Evgenii Volfman**
Claimant - Claim Number 7541
Email: evgeny@volfman.com
26/5 Assor Street, Maale Adumim, Israel, 9836023

United States Bankruptcy Court for the District of Delaware

In re FTX Trading Ltd., et al.

Case No. 22-11068 (JTD)

Claimant: Evgenii Volfman

Claim Number: 7541

Debtor: FTX Trading Ltd.

Response to "Debtors' One Hundred First (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)"

Honorable Judge John T. Dorsey,

I respectfully submit this letter in response to the **Debtors' One Hundred First (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)** filed in the matter of **Case No. 22-11068 (JTD)**, in which I hold a claim.

I do not agree with the modified claim amount stated in Schedule 1 of the **Debtors' One Hundred First (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)** for my **Claim Number 7541**. The final claim amount should be equal to the asserted claim amount of **4999.653383 TONCOIN**, not zero (0) as stated by the Debtors.

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I am submitting this clarification regarding the incorrect records used by the Debtors to review and determine the amount of fiat and cryptocurrency in my account.

I rely on the data and records from the **Claims Portal** (<https://claims.ftx.com/wallet>) regarding the balances and withdrawals of fiat and cryptocurrency from my account. Specifically, I am providing the record of the withdrawal of **4999.653383 TONCOIN** on **November 2, 2022, at 16:35:44 UTC**, which was marked as completed but, in fact, was not processed by the FTX Exchange, and the funds never reached the destination wallet. This record was obtained using "Download CSV" function of the Claims Portal for my account and corresponds to the withdrawal record on the FTX Exchange. All the data is provided below in the **"Details regarding the withdrawal of 4999.653383 TONCOIN from the FTX Exchange on November 2, 2022, at 16:35:44 UTC"** section of my response.

This means that **4999.653383 TONCOIN** should have been recorded as the actual balance for my account at the time when the FTX Exchange stopped its operations and filed for bankruptcy. This amount should be included in my final **Claim Number 7541**.

More details about the aforementioned cryptocurrency withdrawal of **4999.653383 TONCOIN** can be found below. These details are easily understandable by FTX Exchange technical personnel and anyone acquainted with cryptocurrency and the TON Blockchain.

Details regarding the withdrawal of 4999.653383 TONCOIN from the FTX Exchange on November 2, 2022, at 16:35:44 UTC:

This is the screenshot of the record from the **Claims Portal** (<https://claims.ftx.com/wallet>) - **View Account Balances** section – **Withdrawals** tab:

02.11.2022, 17:35:44	TONCOIN	4 999,653383 TONCOIN	MyTonWallet {EQCISKbivNelr13Nsk8n4XYtq0koSFgzFwnZRC1a6sEQQNwv}	Complete (PBQel-NHcow73V0lBBSJqmdLnfvW5p8dglI3BqwG8k=)
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Time on the screenshot is UTC +1. Larger image is in Appendix No. 1

This is the data obtained using "Download CSV" function of the **Claims Portal** (<https://claims.ftx.com/wallet>):

- **Record Number:** 28847472
- **Time:** 2022-11-02T16:35:44.951011+00:00
- **Coin:** TONCOIN
- **Amount:** 4999.653383
- **Destination:** EQCISKbivNelr13Nsk8n4XYtq0koSFgzFwnZRC1a6sEQQNwv
- **Status:** Complete
- **Transaction ID:** PBQel-NHcow73V0lBBSJqmdLnfvW5p8dglI3BqwG8k=
- **Fee:** 0

Based on the information above from the Claims Portal, the withdrawal was processed and marked as completed on November 2, 2022, at 16:35:44 UTC on the FTX Exchange, but the tokens were never actually transferred on the TON Blockchain to my wallet address **EQCISKbivNelr13Nsk8n4XYtq0koSFgzFwnZRC1a6sEQQNwv**.

The transaction, incorrectly marked as complete in the Withdrawal section of the FTX Exchange and the Claims Portal (<https://claims.ftx.com/wallet>), meant that the **4999.653383 TONCOIN** remained on the FTX Exchange and was not delivered to my wallet **EQCISKbivNelr13Nsk8n4XYtq0koSFgzFwnZRC1a6sEQQNwv**.

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Details of the Issue:

1. The withdrawal transaction on November 2, 2022, at 16:35:44 UTC, marked as completed on the FTX Exchange for **4999.653383 TONCOIN**, has the Trace ID **PBQel-NHcow73V0IBBSJqmdLnfvW5p8dglI3BqwG8k=** (Transaction ID in the record provided above), which can be seen in the Claims Portal under the **View Account Balances** section – **Withdrawals** tab. This Trace ID is incorrect and cannot be found in any official TON Blockchain explorers.
2. Using the search function of the official TON Blockchain explorer <https://tonscan.org>, it is possible to find a similar Trace ID: **PBQel+NHcow73V0IBBSJqmdLnfvW5p8dglI3BqwG8k=** (the 6th symbol is "+" instead of "-" in the Withdrawals tab of the Claims Portal). The link to the official TON Blockchain explorer is available in the documentation for the TON Blockchain on its official website: <https://docs.ton.org/participate/explorers>.
3. The Trace ID **PBQel+NHcow73V0IBBSJqmdLnfvW5p8dglI3BqwG8k=** is for a transaction unrelated to the withdrawal of **4999.653383 TONCOIN** from the FTX Exchange to my wallet **EQCISKbivNelr13Nsk8n4XYtq0koSFgzFwnZRC1a6sEQQNWv**, which should have been the destination for the withdrawal. The transaction associated with this Trace ID was a transfer I made from my wallet to the TON-Ethereum bridge, and it is entirely unrelated to the withdrawal from the FTX Exchange to my wallet.
4. I raised support tickets with the FTX Exchange (IDs: **1163910** and **1162568**) in November 2022 regarding the withdrawal transaction for **4999.653383 TONCOIN**, but they remained unresolved because the exchange stopped its operations and filed for bankruptcy.
5. The withdrawal of **4999.653383 TONCOIN** from the FTX Exchange, marked as completed on November 2, 2022, at 16:35:44 UTC, was never sent to the destination address **EQCISKbivNelr13Nsk8n4XYtq0koSFgzFwnZRC1a6sEQQNWv**. As the withdrawal was incomplete, the incorrect withdrawal recording should have been reverted by the technical personnel, and the balance of my account should have been updated by the amount of **4999.653383 TONCOIN**.
6. The balance reflected for my account on the FTX Exchange and the Claims Portal, as well as in the Debtors' records, is incorrect because the withdrawal operation for **4999.653383 TONCOIN** was not completed. The correct balance should be **4999.653383 TONCOIN** at the time when the FTX Exchange stopped its operations.

This information can be easily verified using the blockchain explorers <https://tonscan.org/> or <https://tonviewer.com/>, which store and display immutable data regarding blockchain transactions.

Based on this information, I respectfully request that my **Claim Number 7541** filed in the matter of **Case No. 22-11068 (JTD)** for **4999.653383 TONCOIN** be recognized and included in the final settlement for the Debtor – **FTX Trading Ltd.**

Respectfully submitted,

Evgenii Volfman

Claimant - Claim Number 7541

October 18, 2024



Case 22-11068-JTD

Claim Number 7541

Claimant - Evgenii Volfman

Appendix No. 1

This is the screenshot of the record for withdrawal of **4999.653383 TONCOIN** on **November 2, 2022 at 16:35:44 UTC** from the **Claims Portal** (<https://claims.ftx.com/wallet>) - **View Account Balances** section – **Withdrawals** tab:

02.11.2022, 17:35:44	TONCOIN	4 999,653383 TONCOIN	MyTonWallet (EQCISKbivNelr13Nsk8n4XYtq0koSFqzFwnZRC1a6sEQQNwv)	Complete (PBQel-NHcow73V0IBBSJqmdLnfkvW5p8dglI3BqwG8k=)
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From : Volfman Evgenii
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3rd floor

19801 WILMINGTON Delaware

United States of America

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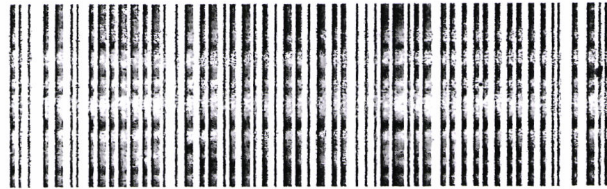
Ref: R

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0,1 kg 1 / 1

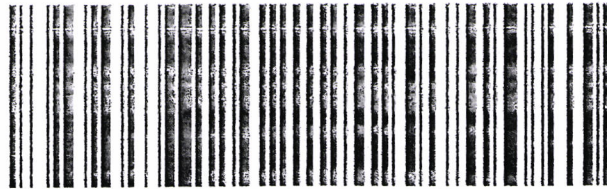
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